

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE: §
§ **CASE No. 20-50805-rbk**
KRISJENN RANCH, LLC §
§ **CHAPTER 11**
DEBTOR. § **(Jointly Administered)**

KRISJENN RANCH, LLC, ET AL. §
§
PLAINTIFFS, § **Adversary No. 20-05027-rbk**
vs. §
§
DMA PROPERTIES, INC. ET AL. §
§
DEFENDANTS. §

**MOTION FOR EXPEDITED CONSIDERATION OF (I) MOTION SEEKING STAY
PENDING APPEAL PURSUANT TO FRBP 8007(A)(1)(A)
AND ESTABLISHING BOND AMOUNT AND (II) MOTION TO QUASH DEPOSITION
NOTICES**

(Reference Docket Nos. 436 and 437)

COMES NOW, KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; KrisJenn Ranch, LLC-Series Pipeline ROW (collectively, “KrisJenn”); and Larry Wright (“Wright”) (collectively, the “Movants” or “Defendants”) and file this *Motion for Expedited Consideration* (“Motion to Expedite”) of (1) *Motion Seeking Stay Pending Appeal Pursuant to FRBP 8007(a)(1)(A) and Establishing Bond Amount* (Docket No. 436); and (2) *Motion to Quash Deposition Notices* (Docket No. 437) (the “Motions”), and in support thereof, the Movants would respectfully show as follows:

1. Underlying Motions: On June 3, 2025, the Movants filed a *Motion Seeking Stay Pending Appeal Pursuant to FRBP 8007(a)(1)(A) and Establishing Bond Amount* (Docket No. 436) seeking a stay pending appeal pursuant to Federal Rule of Bankruptcy Procedure (“FRBP”) 8007(a)(1)(A) and establishing bond amount to preserve the status quo pending appellate review of this Court’s Final Judgment After Remand and its subsequent Attorney’s Fees Order awarding \$750,000 in fees against KrisJenn and Wright.

2. On June 4, 2025, the Movants filed a *Motion to Quash Deposition Notices* (Docket No. 437) seeking to quash certain deposition notices.

3. Need for Expedited Consideration of the Motions: The above-captioned Defendants have calendared depositions of KrisJenn, Wright, and Express H2O Pipeline & ROW, LLC (“Express H2O”) beginning as early as June 11, 2025. KrisJenn and Wright believe the issue raised in the Motions are important and meritorious.

4. The first deposition notice was received on May 21, 2025 and the subpoena for Express H2O was received May 28, 2025. Accordingly, undersigned counsel asserts that the Motions were promptly filed.

5. Further still, undersigned counsel notes that the Court already has a hearing set on the Defendants’ *Motion for Substitute Service and to Appoint Process Server* (Docket No. 434) as well as a separate motion for an attorney to withdraw as counsel on June 10, 2025 at 10:00 am. Accordingly, it appears counsel for Defendants is available.

6. Time Estimate for Hearing: Debtor believes 45 minutes for the Motions should be sufficient, given the interim and/or expedited nature of the relief requested.

7. Deadline for when hearing is needed: Movants request a hearing from the Court to be heard Thursday, June 10, 2025 at 10:00 a.m..

WHEREFORE, Defendants request that the instant Motion to Expedite be granted and that the Court grants such other relief as the Court deems just and proper.

Dated: June 5, 2025

Respectfully submitted,

HAYWARD PLLC

By: /s/ Charlie Shelton
Charlie Shelton
Texas State Bar No. 24079317
7600 Burnet Road, Suite 530
Austin, TX 78757
(737) 881-7100 (Phone/Fax)
cshelton@haywardfirm.com

*Counsel for KrisJenn Ranch, LLC;
KrisJenn Ranch, LLC-Series Uvalde
Ranch; KrisJenn Ranch, LLC-Series
Pipeline ROW; and Larry Wright*

CERTIFICATE OF CONFERENCE

On June 4, 2025, undersigned counsel emailed counsel for the above captioned Defendants regarding expediting the above-referenced motions and they responded that they oppose the request to expedite on the grounds: 1) they do not think there is sufficient time to have them heard on June 10, 2025; 2) the motion to quash had not yet been filed at the time of the request (the motion for stay pending appeal had); and 3) the Defendants had not had a chance to review the motions or to draft a response.

/*s/ Charlie Shelton*
Charlie Shelton

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2025, a true and correct copy of the foregoing has been served electronically via the Court's CM/ECF system upon the parties receiving electronic notice. Additionally, on June 5, 2025, or within one business day thereof, the foregoing ce was served via U.S. First Class Mail to all parties listed below.

COBB AND JOHNS Attn: Christopher S. Johns 14101 Highway 290 West, Suite 400A Austin, Texas 78737 Telephone: (512) 399-3150 Facsimile: (512) 572-8005 cjohns@cobbjohns.com	CLEVELAND KRIST PLLC Attn: Timothy Cleveland & Austin Krist 303 Camp Croft Road, Suite 325 Austin, Texas 78746 Telephone: (512) 689-8698 tleveland@clevelandkrist.com akrist@clevelandkrist.com
<i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i>	<i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i>
JF DUKE AND ASSOCIATES Attn: Jeffery Duke 11818 Great Oaks Drive College Station, Texas 77494 jeff@jfduke.com	LANGLEY & BANACK, INC. Attn: Natalie Wilson 745 East Mulberry Avenue, Suite 700 San Antonio, TX 78212 Telephone: 210-736-6600 Facsimile: (210) 735-6889 nwilson@langleybanack.com
<i>Attorneys for Longbranch Energy, LP</i>	<i>Attorneys for DMA Properties, Inc. and Frank Daniel Moore</i>
BURNS & BLACK PLLC Attn: Michael Black 750 Rittiman Road San Antonio, Texas 78209 Telephone: 210-829-2022 Facsimile: 210-829-2021 fax mblack@burnsandblack.com	CJ MULLER & ASSOCIATES, PLLC Attn: C. John Muller 111 W. Sunset Rd. San Antonio, Texas 78209 Telephone: (210) 664-5000 John.muller@cjma.law
<i>Attorneys for Longbranch Energy, LP</i>	<i>Counsel for KrisJenn Ranch, LLC, Krisjenn Ranch, LLC—Series Uvalde Ranch, KrisJenn Ranch, LLC—Series Pipeline Row</i>
OFFICE OF THE U.S. TRUSTEE Attn: James Rose 903 San Jacinto Blvd, Room 230	THE SMEBERG LAW FIRM, PLLC Attn: Ronald J. Smeberg 2010 W Kings Hwy

Austin, TX 78701 james.rose@usdoj.gov	San Antonio, TX 78201-4926 ron@smeberg.com
<i>United States Trustee</i>	<i>Counsel for Black Duck Properties, LLC</i>

/s/ Charlie Shelton
Charlie Shelton